

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LIAT BOHADANA CASTEIL,
as Administrator ad Prosequendum
for the ESTATE OF SHAY BOHADANA,
decedent,

Plaintiff,

-against-

JUAN C. DIAZ-CASAMAYOR, FLAT
RATE LONG DISTANCE INC. a/k/a
FLAT RATE MOVING & STORAGE, INC.,
PENSKE TRUCK LEASING COMPANY, LP,
ABC CORPORATIONS 1-5 (fictitious names)
and/or JOHN DOES 1-5 (fictitious names),

Defendants.
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NOTICE OF REMOVAL

Docket No.: 15-CV-4925

Defendants, FLAT RATE LONG DISTANCE, INC. and PENSKE TRUCK LEASING
CO., L.P., s/h/a PENSKE TRUCK LEASING COMPANY, LP, through their attorneys,
RENDE, RYAN & DOWNES, LLP, respectfully states upon information and belief:

1. On or about June 5, 2015, defendants received the Summons and Complaint in this
action which is currently pending in the Supreme Court of the State of New York, New York
County. A copy of the Summons and Complaint is annexed hereto as Exhibit "A". The Summons
and Complaint constitute the prior pleadings to date, which upon information and belief states a
wrongful death claim in excess of \$75,000.

2. FLAT RATE LONG DISTANCE, INC. AND PENSKE TRUCK LEASING CO.,
L.P., S/H/A PENSKE TRUCK LEASING COMPANY, LP are removing this action because
plaintiff is not a permanent resident alien domiciled in New York; she is a citizen of Israel. Thus,
the above-entitled action is a civil action of which this Court has original jurisdiction under the

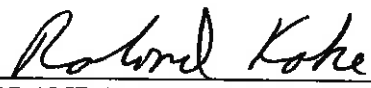
provisions of Title 28, U.S.C. §1332 and is one which may be removed to this Court by the defendants herein pursuant to the provisions of Title 28, U.S.C. §1441 and §1332 (Diversity).

WHEREFORE, defendants pray that the action now pending against it in the Supreme Court of the State of New York in and for the county of New York be removed therefrom to this Court.

Dated: White Plains, New York
June 24, 2015

Yours, etc.,

RENDE, RYAN & DOWNES, LLP

By: 
ROLAND T. KOKE (RK-1068)
Attorneys for Defendant
FLAT RATE LONG DISTANCE, INC.
and PENSKE TRUCK LEASING CO.,
L.P., s/h/a PENSKE TRUCK LEASING
COMPANY, LP
202 Mamaroneck Avenue
White Plains, New York 10601
914-681-0444

TO: THE MANDEL LAW FIRM, P.C.
Attorneys for Plaintiff
370 Lexington Avenue – Suite 505
New York, New York 10017
212-697-7383

CERTIFICATE OF SERVICE

This is to certify that on June 24, 2015, a copy of the foregoing **NOTICE OF REMOVAL** was served on the following counsel of record via regular mail:

THE MANDEL LAW FIRM, P.C.
370 Lexington Avenue – Suite 505
New York, New York 10017



ROLAND T. KOKE (RK-1068)